

Eugene P. Ramirez (State Bar No. 134865)
epr@manningllp.com

Angela M. Powell (State Bar No. 191876)
amp@manningllp.com

Michael Watts (State Bar No. 312210)
mrw@manningllp.com

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**
801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012
Telephone: (213) 624-6900
Facsimile: (213) 624-6999

Attorneys for Defendants, COUNTY OF
VENTURA, et al.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CRAIG COLEY,

Plaintiff,

v.

Case No. 2:18-CV-10385-JWH-JDE
Hon. John W. Holcomb

VENTURA COUNTY; WILLIAM
HANEY, SR.; ESTATE OF
FREDERICK A. JONES; JAMES
HENDERSON; EDWARD VASQUEZ;
JAMES SCHWARZ; SANDRA
TAYLOR; SHANIN SULLIVAN;
SANDRA VANNI; NORM FORT;
AND DOES 1–10, INCLUSIVE,

Defendants.

NOTICE OF SETTLEMENT

Complaint Filed: December 14, 2018

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

PLEASE TAKE NOTICE in accordance with L.R. 16-15.7 and L.R. 40-2 that the parties have reached a tentative settlement of this entire case for a specified amount subject to approval by the County Board of Supervisors. The settlement is between the plaintiff and defendant County of Ventura only.

Pursuant to the tentative settlement reached by the parties, the individual defendants WILLIAM HANEY, SR., JAMES HENDERSON, EDWARD VASQUEZ, JAMES SCHWARZ, SANDRA TAYLOR, SHANIN SULLIVAN,

SANDRA VANNI and NORM FORT will be dismissed without prejudice and are not parties to the settlement.

Upon finalization of the settlement and the execution of a mutually agreed upon release, the entire case and all defendants shall be dismissed with prejudice. All parties intend to file a Stipulation for Dismissal of the Complaint with Prejudice pursuant to the approved settlement of this matter. Thus, the parties request that all hearing dates be vacated and that all proceedings be stayed in anticipation of the approval of the tentative settlement.

DATED: October 12, 2020

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ Michael Watts
Eugene P. Ramirez, Esq.
Angela M. Powell, esq.
Michael Watts. Esq.
Attorneys for Defendant, COUNTY OF VENTURA

DATED: October 12, 2020

**KAYE, McLANE, BEDNARSKI &
LITT, LLP**

By: /s/ Barrett S. Litt
BARRETT S. LITT
RONALD O. KAYE
LINDSAY BATTLES
Attorneys for Plaintiff, CRAIG COLEY

NEUFELD, SCHECK & BRUSTIN, LLP

By: /s/ Nick Brustin
NICK BRUSTIN
ANNA BENVENUTTI HOFFMANN
KATIE MCCARTHY
KATE FETROW
Attorneys for Plaintiff, CRAIG COLEY

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW